UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID'S BRIDAL, INC. and DBD, INC. :

Plaintiffs :

v. :

DAVIBRIDAL.COM et al. :

Defendants :

Civil Action No. 11 Civ.7926 (DLC)

NOTICE OF MOTION OF DEFENDANT READMOB TECHNOLOGIES FOR EXTENSION OF TIME WITHIN WHICH TO MOVE OR ANSWER THE FIRST AMENDED COMPLAINT AND IN OPPOTION TO MOTION FOR ENTRY OF DEFAULT JUDGMENT

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PLEASE TAKE NOTICE that on Monday, April 16, 2012, at 10:00 in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendant jjshouse.com, by its owner Readmob Technologies (HK) Limited shall apply to the Hon. Denise Cote, United States District Judge, at Courtroom 15B, United States Court House, 500 Pearl Street, New York, New York, for an order pursuant to Fed. R. Civ. P. 6(b), granting Defendant an extension of time within which to answer or move against the First Amended Complaint.

The grounds for this motion are: (1) Arent Fox was retained three days ago to represent the Defendant; (2) Defendant's owner only learned for the first time, on March 21, 2012, about the existence of this action and a Motion dated March 19, 2012 filed by Plaintiff seeking a default judgment and related relief against it (the "Default Judgment Motion"), which Default Judgment Motion is returnable tomorrow; (3) there appear to be good and sufficient cause shown to grant the motion so as to enable counsel to defend its client; (4) Defendant would suffer enormous prejudice were a default judgment granted tomorrow.

WHEREFORE, the undersigned respectfully requests that Plaintiff serve its opposition papers, if any, so as to be received no later that seven (7) days prior to the return date of this motion as set forth in Fed.R.Civ.P. 6(c)(2) and that this Court grant the motion to extend time to the Defendant.

Dated: New York, New York
March 29, 2012

Of the Firm Of
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